



OCT - 2 2007

DEPARTMENT OF ENVIRONMENTAL QUALITY

September 26, 2007

Mr. Harbi Elshafei Air Quality Division Department of Environmental Quality 1410 N. Hilton Boise, ID 83706-1255

Re:

Dynamic Fabricators LLC

Air Operating Permit Renewal Application

Supplemental Information

Dear Mr. Elshafei:

In response to your questions on CAM Applicability and Insignificant Source Emissions, please accept the following information as a supplement to the AOP application submitted October 4, 2004.

CAM Applicability

CAM only applies to a source that is subject to an pollutant-specific emissions limitation, uses a control device to achieve compliance with the emissions limitation, and has potential pre-control device emissions equal to or greater major source thresholds.

The only <u>control devices</u> at the facility are (1) the filter bank for the wood shop and (2) the filters for the laminating area – both of which control particulate emissions.

- Since the wood shop is not vented outdoors (the filter bank is a recirculating filter installed for safety reasons, not environmental), the potential uncontrolled emissions are 0 tpy.
- The potential PM emissions from the laminating area are 62.0 tpy worst case as presented in Dynamic Fabricator's April 21, 2004 letter which supplemented the November 19, 2003 PTC application.

Potential PM emissions from both of these sources are below the major source level of 100 tpy for PM or PM10 and as such the third criteria does not apply and CAM is not applicable.

Emissions of a-methyl styrene, styrene, MMA, vinyl acetate, and MEK from the laminating area are uncontrolled and as such they are not subject to CAM.





Insignificant Activities

According to IDAPA 58.01.01.006.101.a.v (IAC 2007), the significant emission rate for ozone is 40 tpy of VOCs and according to IDAPA 58.01.01.006.101.a.iv (IAC 2007), the significant emission rate for particulate matter is 25 tpy PM and 15 tpy PM10.

The emissions calculations for the PVC Gluing and Mold Release Applications were updated based on potential chemical usage, 2006 actual production and process knowledge.

As referenced in the Tier 1 Renewal Application on page 5:

- Items 5 (PVC Pipe & Manifold Gluing Operations) actual emissions (CY 2006) were below 10% of thresholds, and potential emissions are less than significant source levels and less than 1 tpy per individual HAP. The calculations have been revised to incorporate both potential and actual emissions see attachment which should replace page 6 in the Tier 1 Renewal Application.
- Item 6 (Mold Preparation and Release Application Operations) actual emissions (CY 2006) were below 10% of thresholds and potential emissions are less than significant source levels and less than 1 tpy per individual HAP. The calculations have been revised to incorporate both potential and actual emissions see attachment which should replace page 6 in the Tier 1 Renewal Application.
- Item 8: Wood shop activities are not discharged from the facility and the filter system does not have an emergency discharge to atmosphere. The filter system exists as a safety measure to ensure wood dust accumulation on the building structure do not affect employee health or create fire hazards. Therefore, potential and actual PM emissions are 0 tpy.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

If you have any questions, feel free to call me at (208) 773-1787.

Sincerely,

Wade Wolcott

President

Attachment – "Insignificant Emissions Calculations"

c: Beth Fifield Hodgson, Spring Environmental, Inc.

Insignificance Calculations for PVC Gluing, Mold Release Application and Unpaved Road Fugitive Emissions determinations

A. PVC Gluing

Limit (tpy)	Totals (tpy)	PVC Glue	PVC Primer	Product	Actual (2006) VOC & HAP Emissions	Limit (tpy)	Totals (tpy)	PVC Glue	PVC Primer	Product	Potential VOC & HAP Emissions
		78	9	Gal/year	sn			764	82	Gal/year	
		7.77	7.17	lb/gal				7.77	7.17	lb/gal	
		54.7%	100.0%	%	Υ.			54.7%	100.0%	%	√
4.0	0.2	331.5	43.0	lbs	Voc	40.0	1.9	3247.1	587.9	lbs	VOC
_	and the second s	23.0%	37.0%	%			Section of the sectio	23.0%	37.0%	%	M
	2.	139.4	15.9	lbs	MEX	1.0	0.8	1365.3	217.5	lbs	MEK

B. Release Applications

2750	1		***	8		4.0	200			Limit (tpy)
0.0	0.0	And Second construction of the Second	0.0	0.1	Transference of the second and the second of	0.4	Total Commence of the Commence	A could be for the best of the country of the count		Totals (tpy)
The second secon	contraction and and anamed visite of the contraction	or provide and and transfer for the providence of the providence o	may be a common of course of profits the state of the sta	Andrew Commence (Speciments)	Control of the property of the control of the contr	46.3	36.5%	7.92	16	Rexco Partall Film #10
and the first own transfer of the first own transfer own	See Anna page (20) (See Stock descriptions of the product of	congress of the control of the contr	A contract to the property of the contract of	Albert 19.	And Salarana Proposition with the Branch	572.9	67.6%	6.57	129	Rexco Partall Paste #2
en e	27.58	20%	And the second s	82.76	60%	136.6	99.0%	7.26	19	Chemlease PMR (Primer)
50% 31.14	Contraction of the Contraction o	and the transfer of the step of the step of the	enter a construction of the construction of th	31.14	50%	62.3	100%	6.92	9	Chemlease Mold Cleaner
Property of the control of the contr	0.83	20%	55% 24.22	The second	Tart table to a south resident to	43.6	99.0%	7.34	6	Chemiease 15 Sealer
% ibs	H	%		lbs	%	lbs	%	lb/gal	Gal/year	Product
loluene	nz	1,2,4-Trimet	Xylene	_	MEK	ಗ	Voc			otential VOC & HAP Emissions
		-	,	_	_	10.0				a
1,0	1.0		4	3		à c		Participation of the Control of	Control of the last of the las	I thought the first that the second of
T.D	0.1	The first of the second	0,1	0.2	and the state of t	1.8				Totals (tpy)
And the same and the fine of the best of the same and the	distribution of the second second second second	one promotomental amount of the control of	to the control of the	colore to confide Wignesshort downs		173.4	36.5%	7.92	60	Rexco Partall Film #10
and a proper rate of the parties for the first and and the energy profession in	we displace the same tree to the same section of program	acon paradement to que trinibute	enthanticativities to delicate period of the first of management of the first of th	and server when the state of th	and the state of t	2442.7	67.6%	6.57	550	Rexco Partall Paste #2
escaration of continues and con-	108.90	20%	mangara papalorati pil mangara 2000 pil da mangarabitan.	326.70	60%	539.1	99.0%	7.26	75	Chemlease PMR (Primer)
3U% 130.4U	All many 1975.	and the property of the proper	is a particular for the control of the particular of \$200 percentages in special demonstration of \$200 percentages and \$200 percentages and \$200 percentages are also seen to \$200 percentages and \$200 percentages are also seen to \$200 percentages and \$200 percentages are also seen to \$200 percentages and \$200 percentages are also seen to \$200 pe	138.40		276.8	100%	6.92	40	Chemiease Mold Cleaner
Santana.	36.70	20%	55% 100.93	September 1999		181.7	99.0%	7.34	25	Chemlease 15 Sealer
% IDS		%		bs	%	lbs	%	lb/gal	Gal/year	Product
0.000	-		Xylene		MEX	ć	Yoc			otential VOC & HAP Emissions

-- CONTINUED ON PAGE 6-2 -

C. Fugitive Emissions, Vehicle Traffic on Unpaved Roads The emission factors for vehicle traffic on unpaved roads were derived from A-42, Section 13.2.2, September 1998. E=k*(sL/12)^0.8* (V//3)^0.4/(M/0.2)^0.3 where: Emissions = E*VMT = E*Mi*O PM30 7.5 10 5.43 3.36 6.39 18.8 8.8 <u>.</u>55 55 PM10 10 Surface moisture content, % 1.41 Emission factor (lb/VMT), Fork Truck 0.87 Emission factor (lb/VMT), Cars 1.66 Emission factor (lb/VMT), Trucks 18.8 silt content (%) 5 Fork Truck weight (tons) 1.5 Car weight (tons) 0.96 Miles/day - Fork Truck 1.15 Miles/day - Cars 2.6 base emission factor (lb/VMT) 7.5 Truck weight (tons)

Emissions = Emission Control = Emissions =

<u>×</u> o

1.15 0.04 260 2426 50% 1213

0.04 Miles/day - Trucks 260 days/year

631 lbs/year

315 lbs/year controlled

50% % - Mag Chloride application & sweeping

- Used midpoint of silt content and moisture content from Table 13.2.2-3. Range of Source Conditions Used in Developing Equation 1.
 PM30 assumed to equal Total Suspended Particulate (TSP)
 10% of the significance level for ozone = 4 tons/year VOC
 10% of the significance level for PM-10 = 1.5 tons/year PM-10
 10% of the significance level for PM = 2.5 tons/year PM